



# EPA Proposes Change in Cleanup Plan

**Adams Plating Superfund Site**  
Lansing, Michigan

November 2021

## You Are Invited

EPA invites you to discuss the proposed cleanup plan for the Adams Plating Superfund site. See the “Upcoming Meeting” section on Page 2 for details.

## For More Information

Please contact any of the following team members with questions:

### Stephanie Ross

Remedial Project Manager  
312-886-0913  
ross.stephanied@epa.gov

### Ruth Muhtsun

Community Involvement Coordinator  
312-886-6595  
muhtsun.ruth@epa.gov

You may also call EPA toll-free:  
800-621-8431, weekdays, 9:00 a.m. to  
5:30 p.m.

## Webpage

For more details about the site, visit the webpage at:  
[www.epa.gov/superfund/adams-plating](http://www.epa.gov/superfund/adams-plating)

## Information Repositories

EPA keeps site project information and reference materials for the public to read at local information repositories. Copies of cleanup documents for the Adams Plating Superfund site are available at the locations below. You may also access cleanup documents on EPA’s site profile page at [www.epa.gov/superfund/adams-plating](http://www.epa.gov/superfund/adams-plating).

EPA Records Center  
77 W. Jackson Blvd., 7<sup>th</sup> Floor, Chicago

Lansing Public Library  
401 S. Capital St., Lansing

Lansing Township Hall  
3209 W. Michigan Ave., Lansing

U.S. Environmental Protection Agency, working with the Michigan Department of Environment, Great Lakes and Energy, or EGLE, has proposed a change in the cleanup plan for the Adams Plating Superfund site to eliminate potential exposure to vapor contamination. Vapors from volatile organic compounds, or VOCs, trapped in the groundwater and soil beneath the site have been found in a residence next to the site, in soil on the residential property and the former Adams Plating property. The former Adams Plating property is bordered in yellow on the site map below.



## Public Comment Period

EPA will accept comments on the proposed cleanup plan from Nov. 15 to Dec. 15. This fact sheet provides background information, describes cleanup options, and explains EPA’s recommendations.<sup>1</sup> EPA may modify the plan or select another solution based on new information or public comments, so your opinion is important. There are several ways to offer comments:

- Fill out and mail the enclosed comment form.
- Attend the virtual public meeting (see “Upcoming Meeting,” Page 2) and submit an oral statement.
- Send comment via email to [muhtsun.ruth@epa.gov](mailto:muhtsun.ruth@epa.gov).

EPA must receive your comment online or in an envelope postmarked by Wednesday, December 15.



<sup>1</sup>Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, known as the Superfund law) requires public notice about this proposed cleanup plan through a newspaper announcement, comment period, and an opportunity for a public meeting. This fact sheet summarizes information contained in the feasibility study and other documents that can be reviewed at the information repositories listed in the gray box on this page.



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## Upcoming Meeting

EPA will host a virtual public meeting on Nov. 30. After a brief presentation, EPA will answer questions about the proposed plan. EPA will then take public comments, and a court reporter will record the meeting and all comments.

The public meeting will be conducted via the Zoom web platform. A link to the virtual meeting will be posted on [www.epa.gov/superfund/adams-plating](http://www.epa.gov/superfund/adams-plating). You can join the Zoom public meeting at any time during the event hours:

**Date:** Tuesday, Nov. 30

**Time:** 6 – 8 p.m.

EPA will also post instructions to join the meeting by phone on its website.

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## About the Adams Plating Site

The site was referred to the EPA in 1986 and placed on the National Priorities List in 1988, due to soil and groundwater contaminated by metal plating activities. A record of decision, or ROD, was issued in 1993, which identified a remedy consisting of excavation of contaminated soils and replacement with clean fill along with installation of vertical barriers to reduce recontamination. Water encountered during excavation was treated and contained, and a groundwater monitoring plan was created to monitor any potential migration of contaminated groundwater off-site. Institutional controls in the form of site use restrictions were also required in the ROD.

Construction activities were completed in 1994 and the Adams' electroplating business continued to operate on-site until a fire destroyed the building in December 2010. EPA performed an emergency cleanup action from December 2010 to December 2011 in response to the immediate threat to public health and the environment posed by site contamination that had mixed with fire suppression water in city streets, residential yards, and basements. In the fall of 2011, EPA initiated a supplemental cleanup study at the site. The supplemental cleanup study found contaminated vapors in the sump at a residence next to the site and contaminated vapors in the soil both on the residential property and on the site. Therefore, EPA determined additional measures need to be taken to protect people from contaminated vapors from the site.

## Why is Cleanup Needed?

EPA has studied the risks to human health and the environment. Based on its studies, the Agency

determined that vapor contamination poses unacceptable risks to people who may live in a residence next to the former Adams Plating property and/or to people who may occupy a building that could be built on the plant property in the future.

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## Cleanup Alternatives

EPA considered three options for addressing the vapor contamination on the residential property, designated as RP-07, and two for the former Adams Plating property, designated as APC.

**Alternative APC 1: No Action.** EPA is required to include a no-action alternative as a basis for comparison with other cleanup options. Under this alternative, EPA would take no additional action on the Adams Plating site. No cost is associated with this alternative.

**Alternative APC 2: Institutional Controls.** Deed restrictions on the Adams Plating site property would be updated to include requiring a vapor mitigation system be installed if a building were to be constructed on the property.

**Alternative RP07-1: No Action.** EPA is required to include a no-action alternative as a basis for comparison with other cleanup options. Under this alternative, EPA would take no action at the residential property next to the former Adams Plating property.

**Alternative RP07-2 Sump Cover with Passive Ventilation, Sealing and Institutional Controls:** This alternative consists of sealing the basement floor and placing a cover on the sump in the residential property next to the site to eliminate potential pathways for the vapors to enter the home. A pipe would also be installed on the sump cover and routed out of the basement to passively vent vapors to the outside air. This alternative also includes the option of adding a fan to actively pull the vapors from the sump. The seals, sump cover and ventilation would be inspected annually. EPA also recommends land, building and/or activity use deed restrictions be put in place on the residential property to further eliminate potential exposure to contaminated vapors. This would ensure protection of occupants in the future if the property were to be sold. The restrictions would also require the evaluation of the need to install vapor mitigation measures in newly installed structures in areas with contaminated vapors. The estimated cost of this alternative is \$122,000.

### Alternative RP07-3 Passively Vented Aerated Floor System, Sump Cover with Passive Ventilation and Institutional Controls:

This alternative consists of installing pipes into the basement floor of the residential property, which will be vented out through the outside of the building. These pipes would passively carry the contaminated vapors from underneath the building to the outside. This alternative would also include covering and venting the sump, annual inspections, and land, building and/or activity use deed restrictions as described under Alternative-RP07-2. The estimated cost of this alternative is \$169,000.

### EPA's Evaluation Criteria

EPA evaluated the alternatives against the evaluation criteria described in the figure below. These criteria are separated into three categories: Threshold, Balancing and Modifying Criteria. **Threshold Criteria** determines if a cleanup alternative protects human and environmental health and

complies with all applicable or relevant and appropriate requirements, or ARARs. More generally, ARARs are the federal and state regulations that EPA must follow during a cleanup. In cases where the federal and state regulations are slightly different, EPA will follow the stricter regulations. **Balancing Criteria** are used to identify trade-offs between cleanup alternatives. **Modifying Criteria** are based on public comments and can prompt modifications to the recommended cleanup alternative. The table on the back page shows the degree to which each alternative meet each criterion.

### EPA's Recommended Alternative

Based on the criteria, EPA believes that a combination of alternatives APC-2 and RP07-3 is the best option for the site. EPA believes the Agency's recommended alternative meets the threshold criteria and provides the best balance of tradeoffs among the alternatives evaluated with respect to the balancing and modifying criteria.



#### 1. Overall protection of human health and the environment.

- Is it protective?
- How are risks eliminated, reduced, or controlled?



#### 2. Compliance with ARARs.

- Does it meet environmental laws or provide grounds for a waiver?



#### 3. Long-term effectiveness and permanence.

- Does it provide reliable protection over time?



#### 4. Reduction of toxicity, mobility, or volume through treatment.

- Does it use a treatment technology?
- This is preferred, if possible.



#### 5. Short-term effectiveness.

- Will the remedy be implemented fast enough to address short-term risks, and will there be adverse effects (human health or environmental) during construction/ implementation?



#### 6. Implementability.

- How difficult will it be to implement (e.g. availability of materials or coordination of Federal, State, and local agencies)?



#### 7. Cost effectiveness.

- What are the estimated capital and operation and maintenance costs in comparison to other, equally-protective alternatives?



#### 8. State acceptance.

- Does the State agree with, oppose, or have no comment on it?



#### 9. Community acceptance.

- Does the community support, have reservations about, or oppose it?

### Threshold Criteria

*must be met for an alternative to be eligible.*

### Balancing Criteria

*determines relative strengths and weaknesses among the criteria that meet threshold.*

### Modifying Criteria

*implemented once all public comments are evaluated. They may prompt modifications to the preferred alternative to achieve the end result of a preferred alternative for cleanup in which EPA and the community can be confident.*



	Adams Plating Property Alternatives		Residential Property Alternatives		
Evaluation Criteria	APC-1	APC-2*	RP07-1	RP07-2	RP07-3*
Overall Protection of Human Health and the Environment	□	◆	□	◆	◆
Compliance with ARARs	□	◆	□	◆	◆
Long-Term Effectiveness and Permanence	□	❖	□	❖	❖
Reduction of Toxicity, Mobility and Volume through Treatment	□	□	□	□	□
Short-Term Effectiveness	◆	◆	◆	◆	◆
Implementability	◆	◆	◆	◆	◆
Cost	\$0	\$29,000	\$0	\$122,000	\$169,000
State Acceptance	To be evaluated after the public comment period				
Community Acceptance	To be evaluated after the public comment period				

◆ = Meets criterion   ❖ = Partially meets criterion   □ = Does not meet criterion

N/A = Not applicable

\* U.S. EPA recommended alternatives

## Next Steps

EPA, with input from Michigan EGLE and the community, will make the final decision on what cleanup alternative will be implemented. Public comments are important and could encourage EPA to modify or change its preliminary cleanup decision. EPA will review and compile responses to public comments in a document called a responsiveness summary. The final cleanup plan will be published in a document called a “record of decision” or ROD, and available for public review in the site’s administrative record. The ROD (which includes the responsiveness summary) and administrative record will be available for review at [www.epa.gov/superfund/adams-plating](http://www.epa.gov/superfund/adams-plating) and at the information repositories shown in the gray box on the front page.

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## ADAMS PLATING SUPERFUND SITE: EPA Proposes a Change in the Cleanup Plan

United States  
Environmental Protection  
Agency  
Region 5  
Community Involvement and  
Outreach Section (RE-19J)  
77 W. Jackson Blvd.  
Chicago, IL 60604-3590



EPA is interested in your comments on the proposed cleanup plan for the Adams Plating Superfund Site. You may use the space below to write your comments; you may attach additional sheets of paper if you run out of space below. You may submit this form by detaching, folding, stamping and mailing it. Comments must be postmarked by December 15, 2021. If you have any questions, please contact Ruth Muhtsun directly at 312-886-6595, weekdays 9:00 a.m. – 5:30 p.m., CST. Comments may also be sent via email to [muhtsun.ruth@epa.gov](mailto:muhtsun.ruth@epa.gov). Mail written comments to Ruth Muhtsun at **77 W. Jackson Blvd., Chicago, IL 60604**.

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City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

## Adams Plating Superfund Site Comment Sheet

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Place  
First  
Class  
Postage  
Here

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